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*Rocky Mountain Bank and Trust*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

HEATHER NEWTON, individually and  
behalf of others similarly situated,

Plaintiff,

v.

AMERICAN DEBT SERVICES, INC., a  
California corporation; QUALITY SUPPORT  
SERVICES, LLC, a California limited liability  
company; GLOBAL CLIENT SOLUTIONS,  
LLC; ROCKY MOUNTAIN BANK AND  
TRUST; and DOES 1-100,

Defendants.

) Case No: 3:11-cv-03228-EMC

) CLASS ACTION

) ~~PROPOSED~~ ORDER GRANTING  
) DEFENDANTS GLOBAL CLIENT  
) SOLUTIONS, LLC AND ROCKY  
) MOUNTAIN BANK & TRUST AND  
) PLAINTIFF HEATHER NEWTON'S  
) STIPULATED REQUEST FOR  
) EXTENSION OF DEADLINES  
) PERTAINING TO 1) DISCOVERY  
) REQUESTS, 2) SUMMARY  
) JUDGMENT MOTION, AND 3) CLASS  
) CERTIFICATION MOTION AND TO  
) CONTINUE CASE MANAGEMENT  
) CONFERENCE (modified)

THIS CAUSE having come before the Court on Defendants Rocky Mountain Bank & Trust (“RMBT”) and Global Client Solutions, LLC (“Global”) (collectively, “Defendants”) and Plaintiff Heather L. Newton’s (“Plaintiff”) Stipulated Request for an Order: 1) Continuing the deadline for Defendants to comply with Judge Spero’s May 13, 2014 discovery order [Docket #237] (“Discovery Order”); 2) Continuing the hearing date and briefing schedule for Defendants’ pending summary judgment motion; and 3) Continuing the hearing date and briefing schedule for Plaintiff’s motion for class certification, and continuing the Case Management Conference, it is now thereupon,

PURSUANT TO STIPULATION, IT IS SO ORDERED:

1. The Parties’ Stipulation is **GRANTED**.
2. The following deadlines, hearing dates, and Case Management Conference date hereby replace the deadlines and dates in the Court’s May 29, 2014 Order [Docket #241]:
  - a. Defendants shall have up through and including **August 1, 2014** in order to complete the production of documents referenced in this Court’s May 13, 2014 Discovery Order [Docket #237];
  - b. Plaintiff’s Opposition to Motion for Summary Judgment shall be due on **September 19, 2014**;
  - c. Defendant’s Reply on Motion for Summary Judgment shall be due on **October 3, 2014**;
  - d. Hearing on Defendants’ Motion for Summary Judgment shall occur on **October 23, 2014**, at 1:30 p.m.;
  - e. Case Management Conference shall occur on **October 23, 2014**, at 1:30 p.m.;
  - f. Plaintiff’s Motion for Class Certification shall be due on **December 8, 2014**;

- 1 g. Defendants' Opposition to Motion for Class Certification shall be due on  
2 **January 9, 2015;**  
3 h. Plaintiff's Reply on Motion for Class Certification shall be due on **January**  
4 **29, 2015;**  
5 i. Hearing on Motion for Class Certification shall occur on **February 12,**  
6 **2015, at 1:30 p.m.**

7 DONE AND ORDERED in Chambers, at San Francisco, California, on this  
8 20<sup>th</sup> day of June, 2014.

